

WASHINGTON DEPARTMENT OF ECOLOGY
MAIL STOP 7600
OLYMPIA, WASHINGTON 98504

D R A F T – 12/4/06

IN THE MATTER OF:

Longview Fibre Paper and Packaging, Inc.
P.O. Box 639
Longview, WA 98632

]ADMINISTRATIVE ORDER
]No. 3463-AQ06
]

Reference Order Nos.: DE 01AQIS-3279
DE 02AQIS-3440

RCW 70.94.011 reads in part: It is the intent of RCW 70.94 to secure and maintain levels of air quality that protect human health and safety.... RCW 70.94.331(1), through incorporation of RCW 70.94.141(3), authorizes Ecology to issue such orders as may be necessary to effectuate the purpose of RCW 70.94.

This Order rescinds Order Nos. DE 01AQIS-3279 and DE 02AQIS-3440 and replaces necessary conditions as follows: (Note: After Order Nos. DE 01AQIS-3279 and DE 02AQIS-3440 were issued, Longview Fibre Company transferred the facility to Longview Fibre Paper and Packaging, Inc. (LFPP). All references in this Order reflect the transfer.)

1. Order No. DE 01AQIS-3279 delineated applicable units at LFPP and required LFPP to adhere to the general requirements in WAC 173-400-075 and applicable parts of 40 CFR § 63.443-458 Subpart S and appendices. Upon renewal of the LFPP Title V Air Operating Permit (AOP) which includes the requirements in WAC 173-400-075 and applicable parts of 40 CFR § 63.443-458 Subpart S, the need for Order No. DE 01AQIS-3279 no longer exists. Therefore, Order No. DE 01AQIS-3279 is rescinded.
2. Order No. DE 02AQIS-3440 was issued to modify certain monitoring requirements included in Order No. 01AQIS-3279. Order No. DE 02AQIS-3440 cited the appropriate conditions in Order No. 01AQIS-3279 when making the modification rather than citing the appropriate portions of 40 CFR § 63.453, the basis for the conditions. The modifications originally approved in Order No. DE 02AQIS-3440 are referenced to the appropriate portions of 40 CFR § 63.453 in this Order. Therefore, Order No. DE 02AQIS-3440 is rescinded.

Most modifications approved involved visual inspection "every 30 days." The modifications allow specific "every 30 days" inspection requirements to be met with an inspection "every calendar month with no two consecutive inspections occurring within 14 days." The modification allows more scheduling flexibility while still requiring the same number of inspections.

The final modification approved is related to annual leak checks. Certain areas requiring annual leak checks pose safety concerns related to access, confined space, or other factors. Special precautions and arrangements must be made to make the leak checks. The requested modification allows leak checks in areas where safe access is not available to be made once per five years, rather than annually.

Similar requests for visual inspection and leak check modification were made by pulp and paper mills in EPA Regions 4 and 6. EPA responses allowed the requested modifications to be made (12/15/00 letter from R. Douglas Neeley, EPA Region 4 to Robert F. Dansby, International Paper Augusta Mill; and 2/7/01 letter from John R. Hepola, EPA Region 6 to Mr. Greg Wanta, International Paper Company).

Therefore, it is ORDERED that LFPP shall comply with the following:

1. Inspection frequency of "every calendar month with no two consecutive inspections occurring within 14 days" shall satisfy the "every 30 days" portion of the following monitoring requirements:

For each enclosure opening, a visual inspection of the closure mechanism specified in §63.450(b) shall be performed at least once every 30 days to ensure the opening is maintained in the closed position and sealed. [40 CFR § 63.453(k)(1)],

Each closed-vent system required by §63.450(a) shall be visually inspected every 30 days and at other times as requested by the Administrator. The visual inspection shall include inspection of ductwork, piping, enclosures, and connections to covers for visible evidence of defects. [40 CFR § 63.453(k)(2)],

The valve or closure mechanism specified in §63.450(d)(2) shall be inspected at least once every 30 days to ensure that the valve is maintained in the closed position and the emission point gas stream is not diverted through the bypass line. [40 CFR § 63.453(k)(5)], and

Each pulping process condensate closed collection system shall be visually inspected every 30 days and shall comply with the inspection and monitoring requirements... [40 CFR § 63.453(l)(1)].

2. A variance from the following annual inspection requirement is provided for locations where safe access is a concern.

For positive pressure closed-vent systems or portions of closed-vent systems, demonstrate no detectable leaks as specified in §63.450(c) measured initially and annually by the procedures in §63.457(d). [40 CFR § 63.453(k)(3)].

For locations where safe access is not available, Longview Fibre shall submit a list to Ecology with a brief explanation of safety concerns. Upon Ecology approval:

(a) measurement for detectable leaks at locations specified on the list shall not be required annually, and

(b) measurement for detectable leaks at locations specified on the list shall be required on a once per five year interval.

Nothing in this order shall be construed as obviating compliance with any requirement of law other than those imposed pursuant to the Washington Clean Air Act and rules and regulations thereunder.

Failure to comply with this Order may result in the issuance of civil penalties or other actions, whether administrative or judicial, to enforce the terms of this Order.

Authorization may be modified, suspended or revoked in whole or part for cause including, but not limited to, the following:

1. Violation of any terms or conditions of this authorization.
2. Obtaining this authorization by misrepresentation or failure to disclose fully all relevant facts.

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